

AB 885 Comments,

As a member of a local enforcement agency I have a few questions and comments about the draft policy. These may have already been discussed and I was not paying attention. At the Redding meeting, 10/28/11, everyone still seemed to be in "Big Picture" mode, so I didn't want to be too nit-picky.

1. Please provide a scientific or legal definition of Vernal Pool. We don't want to be regulating mud puddles.
2. Section 3.3 requires us to report annual information. It does not say in what format. How will we report? Another obscure data program that no one else uses, and costs us major bucks?
3. Section 7.8 requires that any "new subdivision" in Tier 1 be 2.5 acres per household. Does this affect the hundreds of existing smaller lots that can meet all the rest of Tier 1 setbacks?
4. Section 8.2.3 requires risers within 6" of finished grade. Above or below? And if above, how are they to be secured against unauthorized entry?

The plan seems workable, and I look forward to us continuing to maintain the local control that we currently do. It will be interesting to see how the RWQCB does with implementation.

Thank you,

Don Shelvock, PE, REHS III
Tehama County Environmental Health Department
(530) 527-8020
dshelvock@pacbell.net